

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

DEIDRA MILAN, *on behalf of herself*)
and those similarly situated;)
)
Plaintiff,) Case No. 3:24-cv-00627
)
v.) Judge Aleta A. Trauger
)
MICROVAST, INC., MICROVAST)
HOLDINGS, INC.;)
)
Defendants.)
)

)

JOINT MOTION TO STAY FOR 90 DAYS PENDING MEDIATION

The parties hereby respectfully request, on the terms set forth in this motion, a stay of all proceedings in this case for 90 days pending mediation. As explained in the contemporaneously filed Joint Mediation Report, the parties intend to submit this action to mediation. The parties are in the process of exchanging formal and informal discovery and intend to continue to work cooperatively to facilitate mediation. A stay of all proceedings will benefit both parties by sparing them the expense of contemporaneous litigation and fees and expenditure of time, while also attempting to resolve the matter. The parties also agree that neither party will be harmed by the issuance of a stay, and the parties expect mediation to take place as soon as practicable.

The Court has the authority to issue a stay of proceedings: “[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes of its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254-55 (1936). Accordingly, the parties, through counsel, request the Court order a stay of all proceedings in the matter for 90 days, through July 1, 2025, to allow the parties

to facilitate early resolution of the case. The parties may, upon further motion, seek to extend the stay or to facilitate resolution or mediation. In addition, if the parties determine that the litigation must continue sooner, then they may seek to dissolve the stay. If the case is successfully resolved through mediation, the parties will notify the Court of settlement, otherwise, the stay shall automatically expire on July 1, 2025, absent any modification, and the case shall immediately resume.

Dated: April 1, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of April 2025, a copy of the foregoing was filed electronically utilizing the Court's CM/ECF electronic filing system, with notice of this filing sent by operation of the Court's CM/ECF filing system to all counsel of record listed below.

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/s/ Michael C. Iadevaia

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